

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IN RE:**

**AREU STUDIOS, LLC,**

**Debtor.**

**CHAPTER 11**

**CASE NO. 20-71228**

**APPLICATION FOR APPROVAL OF EMPLOYMENT OF DEBTOR’S ATTORNEY**

COMES NOW Areu Studios, LLC (hereinafter “Applicant”) and respectfully applies for approval to employ attorneys pursuant to 11 U.S.C. § 327 and Bankruptcy Rules 2014 and 5002.

The grounds for this Application are:

1.

On October 29, 2020, Applicant filed a petition for relief under Chapter 11 of Title 11, United States Code, 11 U.S.C. §§ 101 et seq. (as amended, modified or supplemented, the “Bankruptcy Code”). No Trustee has been appointed. Applicant continues to operate its business and manage its affairs as a debtor-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.

2.

Applicant wishes to employ the law firm of JONES & WALDEN, LLC (“J&W”) as counsel in this Chapter 11 case.

3.

Attorneys of JONES & WALDEN, LLC are admitted to practice before this Court, are familiar with the Applicant’s legal and operational problems, have knowledge and experience in bankruptcy practice, and are well qualified to represent Applicant.

4.

During the Chapter 11 case, Applicant will require professional services from attorneys, including:

- (a) Preparation of pleadings and applications;
- (b) Conduct of examination;
- (c) Advising Applicant of its rights, duties and obligations as a debtor-in-possession;
- (d) Consulting with Applicant and representing Applicant with respect to a Chapter 11 plan;
- (e) Performing those legal services incidental and necessary to the day-to-day operations of Applicant's business, including, but not limited to, institution and prosecution of necessary legal proceedings, and general business legal advice and assistance;
- (f) Taking any and all other action incident to the proper preservation and administration of Applicant's estate and business.

5.

Applicant desires to employ JONES & WALDEN, LLC at the firm's ordinary rates for comparable work, plus reasonable expenses, subject to review by the Court, during the pendency of this bankruptcy case. The firm has stated present fee rates of \$200.00 to \$375.00 per hour for attorneys and \$100.00 per hour for legal assistants. Rates may be adjusted from time-to-time.

6.

Attached hereto and incorporated herein by reference is the Verified Statement of an attorney of JONES & WALDEN, LLC offered in support of this Application.

7.

Pursuant to Bankruptcy Rule 6003(a), Applicant shall not seek an order approving this application until 21 days after the Petition Date.

WHEREFORE, Applicant prays that it be authorized to employ JONES & WALDEN, LLC as its attorneys in this Chapter 11 case.

Respectfully submitted this 29<sup>th</sup> day of October, 2020.

**AREU STUDIOS, LLC**

/s/ Ozzie Areu

Ozzie Areu, Manager

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**DECLARATION IN SUPPORT OF DEBTOR'S APPLICATION  
FOR APPROVAL OF EMPLOYMENT OF DEBTOR'S ATTORNEY**

COMES NOW Cameron M. McCord, who states and declares:

1. I am a partner in the law firm of Jones & Walden, LLC (the "Firm") and in that capacity I have personal knowledge of, and authority to speak on behalf of, the Firm with respect to the matters set out herein. This Declaration is offered in support of the Application of the Debtor in the above-styled case to employ the Firm as the Debtor's attorney (the "Application"), and the matters set out herein are true and correct to the best of my knowledge, information and belief.

2. Neither I nor the Firm have or represent any interest adverse to the Debtor or the Debtor's estate, provided that the Firm has been retained by Good Deeds 317, LLC, a subsidiary of Debtor, to represent it in an affiliate Chapter 11 bankruptcy, which is currently pending in the Northern District of Georgia and identified as case number 20-71227. The Firm has no connections with the Debtor, the Debtor's creditors, any other party in interest or their respective attorneys or accountants. The Firm is not a creditor of the Debtor.

3. The Firm has no partners, associates or other professional employees who are related to the United States Trustee, any person employed in the office of the United States Trustee for the Northern District of Georgia, or with any of the Bankruptcy Judges sitting in the United States Bankruptcy Court for the Northern District of Georgia.

4. Neither I nor the Firm have agreed to share any compensation or reimbursement under 11 U.S.C. § 503(b) with any other person except within the Firm. As of the Petition Date, the Firm holds a \$43,885.50 retainer for purposes of this case and its representation of the Debtor herein in which the Firm holds a security interest. The Firm will hold the retainer and will only disburse the retainer in accordance with Court order for payment of fees in accordance with 11 U.S.C. §§ 330 and 331 of the Bankruptcy Code.

5. I and other attorneys of the firm are duly admitted to practice law in the United States District Court for the Northern District of Georgia, among other United States Courts. We have had substantial experience in practice before the United States Bankruptcy Court for the Northern District of Georgia and before other Bankruptcy Courts.

6. To the best of the undersigned's knowledge, information and belief, employment of the Firm as attorneys for the Debtor would be appropriate under 11 U.S.C. § 327 and Bankruptcy Rules 2014 and 5002.

Declared on October 29, 2020

**JONES & WALDEN, LLC**

/s/ Cameron M. McCord

Cameron M. McCord  
Georgia Bar No. 143065  
Proposed Attorney for Debtor  
699 Piedmont Ave, NE  
Atlanta, Georgia 30308  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the date indicated below I caused a true and correct copy of the within and foregoing application and declaration by placing same in a properly addressed envelope with adequate postage affixed thereon by placing same in the U.S. Mail upon the following:

United States Trustee's Office  
362 Richard B. Russell Federal Bldg  
75 Ted Turner Drive SW  
Atlanta, Georgia 30303

This 29<sup>th</sup> day of October, 2020.

**JONES & WALDEN, LLC**

/s/ Cameron M. McCord

Cameron M. McCord  
Georgia Bar No. 143065  
Proposed Attorney for Debtor  
699 Piedmont Ave, NE  
Atlanta, Georgia 30308  
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